

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VALERIECE D. EALOM,
[DOB: 12/02/1968]

Defendant.

Case No. _____

COUNTS ONE, THREE, and FIVE:

***Use of a Communication Facility to
Distribute Heroin***

21 U.S.C. §§ 843(b) and (d)(1)

NMT 4 Years Imprisonment

NMT \$250,000 Fine

NMT 1 Year Supervised Release

Class E Felony

COUNT TWO:

Distribution of Heroin

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NMT 20 Years Imprisonment

NMT \$1,000,000 Fine

NLT 3 Years Supervised Release

Class C Felony

COUNT FOUR:

Distribution of Heroin Causing Death

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NLT 20 Years Imprisonment

NMT Life Imprisonment

NMT \$1,000,000 Fine

NLT 3 Years Supervised Release

Class A Felony

COUNT SIX:

Possession With Intent to Distribute Heroin

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NMT 20 Years Imprisonment

NMT \$1,000,000 Fine

NLT 3 Years Supervised Release

Class C Felony

\$100 Mandatory Assessment Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about June 19, 2016, in the Western District of Missouri, the defendant, VALERIECE D. EALOM, did knowingly and intentionally use a communication facility, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), that is distribution of heroin, all in violation of Title 21, United States Code, Section 843(b).

COUNT TWO

On or about June 19, 2016, in the Western District of Missouri, the defendant, VALERIECE D. EALOM, did knowingly and intentionally distribute some quantity of a mixture and substance containing heroin, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

On or about June 20, 2016, in the Western District of Missouri, the defendant, VALERIECE D. EALOM, did knowingly and intentionally use a communication facility, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), that is distribution of heroin, all in violation of Title 21, United States Code, Section 843(b).

COUNT FOUR

On or about June 20, 2016, in the Western District of Missouri, the defendant, VALERIECE D. EALOM, did knowingly and intentionally distribute some quantity of a mixture and substance containing heroin, a Schedule I controlled substance, the use of which caused the

death of J.B., contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIVE

On or about October 3, 2016, in the Western District of Missouri, the defendant, VALERIECE D. EALOM, did knowingly and intentionally use a communication facility, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), that is distribution of heroin, all in violation of Title 21, United States Code, Section 843(b).

COUNT SIX

On or about October 3, 2016, in the Western District of Missouri, the defendant, VALERIECE D. EALOM, did knowingly and intentionally possess with intent to distribute some quantity of a mixture and substance containing heroin, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

A TRUE BILL.

8/6/19
DATE

/s/ Tressie Borders
FOREPERSON OF THE GRAND JURY

/s/ Jeffrey Q. McCarther
Jeffrey Q. McCarther
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit
Western District of Missouri